

1 Hal Taylor, Esq.  
2 Of Counsel, Olinsky Law Group  
3 NV Bar No.: 4399  
4 2551 West Lakeridge Shores  
5 Reno, NV 89519  
6 Tel: (775) 825-2223  
7 Fax: (775) 329-1113  
8 Email: [HalTaylorLawyer@gbis.com](mailto:HalTaylorLawyer@gbis.com)  
9 Attorney for Plaintiff

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12  
13 DEONTA JAMAL JONES, )  
14 Plaintiff, ) CASE NO.  
15 v. ) 2:23-cv-01756-JCM-EJY  
16 MARTIN O'MALLEY, )  
17 COMMISSIONER OF SOCIAL SECURITY, )  
18 Defendant. )  
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22 Plaintiff, Deonta Jamal Jones, by his attorney, moves for a forty-five (45) day extension  
23 of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed by  
24 Monday, January 22, 2024.  
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26 Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel  
27 requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance,  
28 between January 5, and March 5, 2024, staff in Counsel's office have one hundred and sixty-one  
(161) Plaintiff briefs due. This figure does not include briefings which will be due after the filing  
of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts,  
Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the  
course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare

1 the brief by the current deadline. This request will not cause Defendant any undue hardship. This  
2 extension is needed to thoroughly and properly prepare the brief.

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4 Wherefore, Plaintiff requests an extension from January 22, 2024, up to and including  
5 March 7, 2024, to file his brief. Counsel for the Plaintiff has conferred with Defendant's Counsel  
6 who kindly consents to this request.

7 Dated January 15, 2024.

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9 Respectfully submitted,

10  
11 /s/Hal Taylor  
12 Hal Taylor, Esq.

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14 **ORDER**

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16 IT IS SO ORDERED.

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U.S. MAGISTRATE JUDGE

Dated: January 16, 2024